

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
UNITED STATES OF AMERICA,	)	CASE NO.
	)	CASE NO. CR 18-577 CRB
Plaintiff,	)	
	)	STIPULATION REGARDING BUSINESS
v.	)	RECORDS OF JOHN MARSHALL BANK
	)	
MICHAEL RICHARD LYNCH and	)	
STEPHEN KEITH CHAMBERLAIN,	)	
	)	
Defendants.	)	
<hr/>		
<p>The United States and Defendants Michael Richard Lynch and Stephen Keith Chamberlain hereby stipulate that the following documents are (1) business records pursuant to Federal Rule of Evidence 803(6) because they were made at or near the time by someone with knowledge; kept in the course of regularly conducted business; and made as part of a regular business activity; and (2) are authentic pursuant to Federal Rule of Evidence 901, 902(11), 902(13), and/or 902(14).</p>		
Exhibit	Description	Custodian
582	Checking Account Records for MT/DT for January 2010	John Marshall Bank
786	Statement dated April 30, 2010, for Discover Technologies LLC	John Marshall Bank

<p>UNITED STATES DISTRICT COURT</p> <p>NORTHERN DISTRICT OF CALIFORNIA</p> <p>SAN FRANCISCO DIVISION</p>		
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STIP RE BUSINESS RECORDS (JMB)

1

CASE NO. CR 18-577 CRB

[illegible]

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN,

Defendants.

) CASE NO. CR 18-577 CRB

) STIPULATION REGARDING BUSINESS RECORDS OF JOHN MARSHALL BANK

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STIP RE BUSINESS RECORDS (JMB)  
CASE NO. CR 18-577 CRB

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Exhibit	Description	Custodian
1529	Checking Account Records for DiscoverTech for January 2011	John Marshall Bank
1902	Discover Technologies bank statement for the period ending June 30, 2011	John Marshall Bank
2059	Bank statement for Discover Technologies' account at John Marshall Bank for the period ending July 31, 2011.	John Marshall Bank

DATED: March 14, 2024

Respectfully submitted,

PATRICK D. ROBBINS  
Attorney for the United States,  
Acting Under Authority Conferred by  
28 U.S.C. § 515

/s/

ROBERT S. LEACH  
ADAM A. REEVES  
KRISTINA N. GREEN  
ZACHARY G.F. ABRAHAMSON  
Assistant United States Attorneys

DATED: March 14, 2024

CLIFFORD CHANCE US LLP

/s/

CHRISTOPHER J. MORVILLO  
Attorneys for Defendant Michael Lynch

DATED: March 14, 2024

BIRD, MARELLA, BOXER, WOLPERT,  
NESSIM, DROOKS, LINCENBERG, &  
RHOW, P.C.

/s/

GARY S. LINCENBERG  
Attorneys for Defendant Stephen  
Chamberlain